

TAYplan Strategic Development Plan Authority

Summary of Unresolved Issues (Schedule 4)

Issue number 24: Other Issues

Contents

1. Summary of Unresolved Issues
2. Copy of actual representations pertinent to this issue (<i>Personal details have been redacted. Full details have been provided to the DPEA separately.</i>) <ul style="list-style-type: none">• All representations include any attachments submitted by the respondent.• Where representations were submitted in hard copy or by email these were entered into TAYplan's online system and all material originally submitted has been attached and appears here with the representation.
3. Library of documents <ul style="list-style-type: none">• All documents and extracts referred to in the representation and/or the Schedule 4 are either contained in the library attached to this Schedule or where over 50 pages within the Core Library (separate folders).

1. Summary of Unresolved Issues

Issue		
Issue number 24: Other Issues		
Development plan reference:	Other Issues relating to entire Plan	Reporter: [Note: For DPEA use only]
Body or person(s) submitting a representation raising the issue and representation references		
Seeking a change		
ID Number	Person/Organisation	Representation Reference
548151	Mr Andrew McCafferty for GD Strawson and J Farquharson	PLAN440
548506	Ryden for University of St. Andrews	PLAN719
346407	D G Coutts Associates for Linlathen Developments	PLAN289
547768	G.M.Gall	PLAN563
548382	Halliday Fraser Munro for Barratt Homes	PLAN594
548055	Mr Ian Fowler	PLAN386
548055	Mr Ian Fowler	PLAN392
348875	Mrs Jennifer Hopgood	PLAN795
548413	Mr John Hendrie	PLAN572
377831	Mrs Judith Harding	PLAN503
327210	J. Khazaka	PLAN930
546838	Kinross-shire Civic Trust	PLAN498
344887	Penny Uprichard	PLAN872
548708	Philip Anthony Hardie	PLAN799
548408	Mrs Marion Lang	PLAN570
450613	Councillor Michael A Barnacle	PLAN819
416017	Colliers International for Persimmon Homes	PLAN59
337727	Colliers International for Gleneagles Hotel	PLAN72
337727	Colliers International for Gleneagles Hotel	PLAN71
541486	Colliers International for Taylor Wimpey East Scotland	PLAN74
443979	Lynne Palmer	PLAN161
453889	Royal Burgh of St. Andrews Community Council	PLAN913
547750	St. Andrews Preservation Trust	PLAN850
546153	Strathkinness Community Council	PLAN191
441086	Jones Lang LaSalle for Scottish and Southern Energy and its Group Companies	PLAN906
547863	Wallace Planning Limited for National Grid Property Holdings Limited	PLAN350
Support as Written		
ID Number	Person/Organisation	Representation Reference
423150	Braes of Carse Conservation Group	PLAN25
337727	Colliers International for Gleneagles Hotel	PLAN48
337727	Colliers International for Gleneagles Hotel	PLAN49
381473	Mrs Patricia Millar	PLAN36

	Montgomery Forgan Associates for VGH (VICO Ltd/Bett	
349134	Homes/Headon Developments Ltd.	PLAN573
344848	Scottish Natural Heritage	PLAN411
344848	Scottish Natural Heritage	PLAN412
346693	Health & Safety Executive	PLAN933

Provision of the development plan to which the issue relates:	Foreword Pg 3 Monitoring Arrangements Pg 23 Other Issues relating to entire Plan
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Planning Authority's summary of the representations

SUMMARY OF REPRESENTATIONS SEEKING A CHANGE

FOREWARD (Page 3)

Lynne Palmer (443979) wishes to see a mention of Perth included into the Foreword, as well as more explanation upon the term "development build in". **Jones Lang La Salle for Scottish and Southern Energy (441081)** support the growth of Dundee and Montrose ports as supporting the renewable energy industry and the Plans emphasis on moving to a low carbon economy. They seek the foreword to recognise the importance of onshore renewable industry as part of this. **Penny Uprichard (344887)** wishes to change the wording in the foreword to "hopeful" instead of "optimistic".

MONITORING ARRANGEMENTS (Pg 23)

Strathkinness Community Council (546153) wish to have more quantitative monitoring arrangements included, as they state there was little clarity about what was to be measured, by whom, or when.

PUBLIC ENGAGEMENT AND CONSULTATION

D G Coutts Associates for Linlathen Developments (346407) wishes to place on record that the process of consultation to be tortuous and confusing. **St. Andrews Preservation Trust (547750)** highlights that public consultation is likely to have been adversely affected by the statement made that the plan would incorporate major elements of the Fife Structure Plan. The point is also made that the software used for consultation was frustrating and counter-intuitive and laid out in a way which is designed for analysis rather than to make data entry simple for consultees. **G.M.Gall (547768)** also mentions that attempts were made to use the internet portal, but without success. **Ian Fowler (548055- PLAN386)** wishes to note that there was no mention of the ability to send a formal written letter as part of the conclusion stage. **Ian Fowler (548055-PLAN392)** wishes to know how Local Developments Plans will consult the public and what guarantees the public have on there being a fair consultation. When Local Development Plans identify appropriate land to be allocated for housing. **Royal Burgh of St. Andrews Community Council (453889)** feels that the Proposed Plan disregards public opinion and that there are many indicators that planning officials have already made decisions on substantive questions. **Mrs Jennifer Hopgood (348875)** states it appears that representations made during the Consultation about future development of St. Andrews and green belts can not be meaningful. When decisions with regard St. Andrews Strategic Development Area have already been made, since the TAYplan is to take forward the commitments of the Structure Plan.

GENERAL COMMENTS

Mrs Judith Harding (377831) mentions that traffic management has been undertaken in an ad hoc fashion and wishes a mention of the St. Andrews rail link. As well as more detailed information on green transport issues to be added to Transport Topic Paper 7.

Mrs Marion Lang (548408) notes that TAYplan is a huge authority which is too big and too remote to be of relevance to most residents.

Colliers International for Persimmon Homes (4160170); Colliers International for Gleneagles Hotel (337727); and Colliers International for Taylor Wimpey East Scotland (541486) submitted a courtesy response of all comments made to Proposed Plan.

Royal Burgh of St. Andrews Community Council (453889) wishes to see the Plan address the failure to address the town of St. Andrews main problems of affordable housing provision and green belt designation.

Ryden for University of St. Andrews (548506) wishes to see the role of the education and research as a regional economic driver recognised consistently throughout the plan and wishes to see it highlighted on page 5.

Halliday Fraser Munro for Barratt Homes (548389) notes the document is difficult to navigate in terms of structure and identification of key policies. Also that there is an over-reliance on detailed policy and a number of aims and policy statements are without support.

Wallace Planning Limited for National Grid Property Holdings Limited (547863) notes that it would be essential to provide a glossary; in the interest of both clarity, transparency and avoid misunderstandings.

Halliday Fraser Munro for Barratt Homes (548389) notes that the Plan accords with Scottish Government's requirements for brevity, but lacks substance and vision; and that a large part of the content is re-iteration of existing advice and policy. **Mr Andrew McCafferty for G D Strawson and J Farquharson (548151)** notes the Plan needs to be more explicit about what it is seeking to achieve in line with Scottish Planning Policy guidance.

Mr John Hendrie (548413) wishes the plan to contain an explanation on why it also covers villages that sit on the Forth and why that it is relevant these are included.

Mr John Hendrie (548413) wishes the plan to set out how it deals with conflicting targets between the Structure Plan and Proposed Plan.

Philip Anthony Hardie (548708) wishes to know whether the one site school is the subject of the TAYplan consultation.

St. Andrews Preservation Trust (547750) wishes to see climate change considerations being reflected in practically every aspect of the plan and that TAYplan needs to elevate active green policies to a higher level. **J Khazaka (327210)** considers the plan is flawed and will leave the Perth Core Area disadvantaged due to lack of deliverable housing, employment and public space provision.

Kinross-shire Civic Trust (546838) is concerned with the coordination of timings of the TAYplan and the Perth and Kinross Council Local Development Plan due in December 2011.

Michael A Barnacle (450613) wishes to question the synergy of timescales with the aim to submit the TAYplan by January 2012 and the Perth and Kinross council Local Development Plan, after MIR to be published in December 2011.

ENVIRONMENTAL REPORT AND LANDSCAPE ASSESSMENTS

Mrs Jennifer Hopgood (348875) wishes to see more appreciation given to the importance of St. Andrews and its landscape setting as laid out in the landscape assessments. **Penny Uprichard (344887)** notes the Environmental Report - Non-Technical Summary included an alarming number of issues which were predicted to have a 'negative impact' or a 'significant negative impact' on the environment. And wishes to know what has happened to these predictions. It was also noted that the Tyldesley landscape assessments and the Alison Grant landscape capacity assessment and the Green Belt Study of St. Andrews 2003 would remain as material considerations Miss Penelope Uprichard also wants to know whether these assessments were a material consideration for TAYplan. In connection its noted that note the Environmental Report (2 pages after p. 129-'Strategic Sensitivities') state that '57% of the land mass in the TAYplan region is characterised as sensitive and the respondent wishes to know as to whether that 57% of the land mass will have any environmental protection. It is also noted that the maps on these pages (and others) are poor, the colours indistinguishable, and the text is tiny, so that they might as well not be there for all the information they provide - particularly as no settlements are marked, so it is difficult to establish the areas of each 'rating'. The 'population density' page is equally uninformative, The 'Population Growth (2001-2008)' is no help either. For the public they will remain confusing and almost illegible. **St. Andrews Preservation Trust (547750)** wishes to see the environmental report change from a catalogue of possible effects to a document with direct impact on the Plan.

SUMMARY OF REPRESENTATIONS SUPPORTING AS WRITTEN

Scottish Natural Heritage (344848) support about the recognised importance of protecting and enhancing landscapes and natural heritage. Also the recognition in the Proposed Plan that tackling climate change is a principal challenge of sustainable economic growth. **Montgomery Forgan Associates for VGH (VICO Ltd/Bett Homes/Headon Developments Ltd) (349134)** support the foreword due to its emphasis the recognition that it was opportune moment to shape a better TAYplan region. Also support was raised for the recognition that sustainable economic growth lay at the heart of stronger resilient economy and better quality places.

Colliers International for Gleneagles Hotel (337727) support the emphasis on the region's tourist and economic development assets and the inclusion of Gleneagles hosting Ryder Cup 2014 in that context. **Colliers International for Gleneagles Hotel (337727)** support the tone and emphasis of TAYplan in recognising high quality, particularly in tourism and economic development.

Braes of the Carse Conservation Group (423150) generally support and endorsement of the policies contained in the whole of the Proposed Plan. **Mrs Patricia Millar (381473)** supports the Proposed Plan and found them interesting and informative.

Health & Safety Executive (346693) advise that they have no further comments to make.

Modifications sought by those submitting representation(s) with minor typographical errors corrected:

NOTE TO REPORTER: The text in italics in this section has been lifted directly from the each individual/organisation's representation with minor typographical errors corrected.

FOREWARD (Page 3)

Lynne Palmer (443979) "Page 3 there's jargon in the forward "development builds in"? also there's mention of Dundee but not Perth".

Jones Lang LaSalle for Scottish and Southern Energy and its Group Companies (441086) "The foreword should "recognise the importance of the onshore renewables industry".

Penny Uprichard (344887). “In the foreword to the proposed strategic development plan, Councillor Beare says that ‘Despite the global economic situation there is much to be optimistic about’. Perhaps a better word would be hopeful, as current economic prospects appear to be depressing”.

MONITORING ARRANGEMENTS (Pg 23)

Strathkinness Community Council (546153) “While indicators of progress were identified, many were qualitative and not quantitative, and there was little clarity about what was to be measured, by whom, or when”.

PUBLIC ENGAGEMENT AND CONSULTATION

D G Coutts Associates for Linlathen Developments (346407); G.M.Gall (547768); Ian Fowler (548055- PLAN 386); Mrs Jennifer Hopgood (348875); Royal Burgh of St. Andrews Community Council (453889); and, St. Andrews Preservation Trust (547750) No specific change identified.

Ian Fowler (PLAN392, 548055) “Could you change the line to Local Development Plans will identify appropriate land to be allocated for housing after proper consultation”.

GENERAL COMMENTS

Mrs Judith Harding (377831) “traffic management seems to be on an ad hoc basis. There has been no mention of a rail link to St. Andrews and of how expensive commuting can be discouraged. Green issues are mentioned but in passing”.

Mrs Marion Lang (548408); Colliers International for Persimmon Homes (4160170); Colliers International for Gleneagles Hotel (337727); Colliers International for Taylor Wimpey East Scotland (541486); and, Royal Burgh of St. Andrews Community Council (453889). No Specific change identified.

Ryden for University of St. Andrews (548506) “the economy is diverse from agriculture, forestry and public administration to hi-tech engineering, life sciences research and development and computer game production. The region supports a diverse range of higher and further education institutions, which are significant economic drivers. It is also a home or a major base for several of the leading 100 companies in the stock exchange (FTSE 100)”.

Halliday Fraser Munro for Barratt Homes (548389) “the document is difficult to negotiate in terms of structure and identification of key policies”. **Wallace Planning Limited for National Grid Property Holdings Limited (547863)** “it is essential that a Glossary is provided within the SDP. This is in the interest of both clarity and transparency and is essential to avoid dispute and misunderstanding”.

Halliday Fraser Munro for Barratt Homes (548389) “the plan accords with Scottish Government’s requirements for brevity but lacks substance and vision. A large part of the content is re-iteration of existing government advice and policy. There is an over-reliance on detailed policy and a number of the aims and policy statements are without support”. **Mr Andrew McCafferty for G D Strawson and J Farquharson (548151)** “the plan needs to more explicit about what it is seeking to achieve in line with guidance in Scottish Planning Policy Guidance”.

Mr John Hendrie (548413) “can the Plan explain why it also covers villages that sit on the Forth and why it is more relevant to those villages to be included in TAYplan?”

Mr John Hendrie (548413) “the next 20 year TAYplan will run parallel with the yet to be adopted current Structure and Local Plans. Can it please set out how it deals with possible conflicting targets”.

Philip Anthony Hardie (548708) “I am not certain whether the one site school is the subject of the TAYplan consultation”.

St. Andrews Preservation Trust (547750) “Our suggestion is that climate change considerations need to be reflected in practically every policy aspect of the plan. The environmental statement appears to mainly catalogue possible effects rather than actively manage them. There is no direct connection between policies in the Tayplan and the local effects of global warming, but the Tayplan needs to elevate active policies to a higher level”. **J Khazaka (327210)** “states that this Plan is dangerously flawed and will leave the Perth Core Area and its wider context disadvantaged with a shortfall of delivered sustainable housing, employment and public space provision”. **Royal Burgh of St. Andrews Community Council (453889)** identify no specific change but imply changes to housing numbers, affordable housing provision, green belt and more consideration of respondent views.

Kinross-shire Civic Trust (546838) “there is concern about the timing of the TAYplan and the PKC LDP due in December 2011”. **Michael A Barnacle (450613)** “I note that you aim to submit the Plan to Scottish Ministers by January 2012. I note also that PKC's LDP (following comments and submissions on the MIR) is set to be published in December 2011 for a three month consultation to March 2012. I question the synergy of timescales here but presumably you can confirm that the SDP has to be in place in order for the four authorities LDP's to be seen to broadly concur with it?”.

ENVIRONMENTAL REPORT AND LANDSCAPE ASSESSMENTS

Mrs Jennifer Hopgood (348875) The SEA has assessed the impact at strategic level, relative to the strategic nature of the plan. It appears that the TAYplan does not appreciate the importance of St Andrews and its landscape setting.

Penny Uprichard (344887) Environmental Report-Non Technical Summary (2010) included aspects of the strategy which predicted negative impacts “Have any of them been allowed to change any aspects of the Plan, or have they simply been regarded as ‘acceptable?’”. The “three Tyldesley landscape assessments and the Alison Grant landscape capacity assessment and the Green Belt Study of St. Andrews 2003 would remain as material considerations” “Have they been taken into account?” In this connection I note the Environmental Report (2 pages after p. 129-‘Strategic Sensitivities’) states that ‘57% of the land mass in the TAYplan region is characterised as sensitive in terms of natural and/or cultural heritage assets’. Does this designation mean that 57% of the land mass will have any environmental protection? How does the TAYplan define ‘sensitive’, and what effect does this have on plans for development? The maps on these pages (and others) are poor, the colours indistinguishable, and the text is tiny, so that they might as well not be there for all the information they provide - particularly as no settlements are marked, population density’ page is equally uninformative - despite prolonged scrutiny I was unable to make out which rating applied to St. Andrews. The ‘Population Growth (2001-2008)’ is no help either.

St. Andrews Preservation Trust (547750) “The environmental statement appears to mainly catalogue possible effects rather than actively managing them”.

Summary of responses (including reasons) by Planning Authority

RESPONSES TO REPRESENTATIONS SEEKING A CHANGE

FOREWARD (Page 3)

Lynne Palmer (443979):- the foreword is highlighting some key aspects which have shaped the Plan. Although Perth has not been mentioned in the foreword, the Plan clearly sets out the importance of Perth to the economy. **Jones Lang La Salle for Scottish and Southern Energy (441081)**:- TAYplan do not consider there is a need to include this in the foreword as it

is included in the Schedules covering Policy 7: Energy and Waste Management.

Penny Uprichard (344887):- the word '*optimistic*' and '*hopeful*' are considered to have similar meaning and therefore any amendment would not offer any significant change in meaning to what is already written in the Proposed Plan as presently written.

MONITORING ARRANGEMENTS (Pg 23)

Strathkinness Community Council (546153):- the detail of monitoring arrangements will be set out in the next monitoring report. The Proposed Action Programme (October, 2011) (CL/Doc37) sets out the actions required to deliver the Proposed Plan and as such provides further detail. The respondent does not identify any specific changes.

PUBLIC ENGAGEMENT AND CONSULTATION

D G Coutts Associates for Linlathen Developments (346407) and G.M.Gall (547768):- this issue does not relate to a specific change to the Proposed Plan. Nevertheless 77% of responses were received online with very few requiring assistance.

St. Andrews Preservation Trust (547750); Royal Burgh of St. Andrews Community Council (453889); and Mrs Jennifer Hopgood (348875):- the Fife Structure Plan (2009) was one of many documents considered in preparing the Proposed Plan. According to Circular 1/2009 (paragraph 17) (024/SL/Doc44), the Scottish Government considers that it would be good practice to draw from existing Structure Plans within the first generation of Strategic Development Plans. Paragraph 78 of Circular 1/2009 (024/SL/Doc45) also says that reporters should generally not recommend modifications to parts of plans that have been examined in previous examinations or rolled forward from previous plans, unless circumstances have clearly changed. The establishment of a Strategic Development Planning Authority and production of the first Strategic Development Plan does not mean everything from a land use perspective or land allocation starts from a clean slate.

Ian Fowler (548055- PLAN 386):- Although TAYplan did emphasise the online portal, hard copies of letters and emails were also accepted and this was clearly stated in the documentation which was issued for representations, including in the participation statement and during information events. **Ian Fowler (548055-PLAN392):-** consultation with the public is a legal requirement and will be outlined in the Local Development Plan Participation Statement and as such does not require a change to this Proposed Plan.

GENERAL COMMENTS

Mrs Judith Harding (377831):- The Proposed Plan encourages modal shift to public transport, as set out in Policy 3 (Transport). The Plan also contains a robust and adequate policy framework for '*green issues*'. The issue raised in relation to seeking a change for the inclusion of a St. Andrews rail link is considered in more detail in Schedule 4 Issue Number 2: Proposals Map.

Mrs Marion Lang (548408); Colliers International for Persimmon Homes (4160170); Colliers International for Gleneagles Hotel (337727); Colliers International for Taylor Wimpey East Scotland (541486); and, Royal Burgh of St. Andrews Community Council (453889):- there are no specific changes sought to the Proposed Plan.

Ryden for University of St. Andrews (548506):- the wording change is considered to mean the same thing and therefore any amendment would not offer any significant change in meaning to what is already written in the Proposed Plan. No changes are sought by the Scottish Government to the Proposed Plan in this respect.

Halliday Fraser Munro for Barratt Homes (548389):- the layout is considered appropriate and has support of statutory Key Agencies. The Proposed Plan responds to The Scottish Government's drive to see new Strategic and Local Development Plans using more graphics than was the case previously. The Proposed Plan is clear and concise. **Wallace Planning Limited for National Grid Property Holdings Limited (547863):-** it was considered a glossary was unnecessary due to lack of technical jargon and the use of simplistic language used in the Proposed Plan. Also Scottish Planning Policy does not contain a glossary. No change is considered necessary.

Halliday Fraser Munro for Barratt Homes (548389) and **Mr Andrew McCafferty for G D Strawson and J Farquharson (548151):-** The Proposed Plan is consistent with Scottish Planning Policy; however it does not require to repeat national policy. The Proposed Plan interprets this at a City Region scale in a clear, concise and visionary way.

Mr John Hendrie (548413):- the Proposed Plan replaces the Structure Plan and as it is a legal requirement that Local Development Plans take account of Strategic Development Plans. Villages on the Forth are within the TAYplan area, along the East Neuk of Fife.

Philip Anthony Hardie (548708):- The issue of a site for the new school will be considered by the Local Planning Authority. This is a site specific issue which is not strategic.

St. Andrews Preservation Trust (547750):- the Proposed Plan takes account of the Climate Change (Scotland) Act 2009 (CL/Doc13). In responding to the Main Issues Report Scottish Government stated that the "TAYplan Partnership is currently the best example we have of a public body responding to climate change duties" (The Scottish Government, July 2010). Landuse planning only has a small role to play in what it can effect in regards to climate change, nevertheless the Proposed Plan responds to the Act by providing a policy framework for landuse decisions which will assist in achieving national targets.

J Khazaka (327210):- Policy 5: housing provides an achievable amount of deliverable sustainable housing, employment and public space provision for the Perth Core Area. This is considered in more detail within Schedule 4 Issue Number 3: Locational Priorities Policy 1 settlement tiers.

Royal Burgh of St. Andrews Community Council (453889):- The Proposed Plan considers the strategic landuse planning issues which relate to St. Andrews. These issues are considered in more detail within other Schedule 4's (Issue Number 8: Green belts; Issue Number 15: policy 5: Housing scale and distribution; Issue Number 19: policy 5: Housing Policy 5a range and mix of housing inc. affordable housing).

Kinross-shire Civic Trust (546838) and **Michael A Barnacle (450613)** There are no conflicts with the Strategic Development Plan and the Local Development Plan timescales.

ENVIRONMENTAL REPORT AND LANDSCAPE ASSESSMENTS

Mrs Jennifer Hopgood (348875); Penny Uprichard (344887); and, **St. Andrews Preservation Trust (547750):-** the Environmental Report (April, 2010) (CL/Doc41) set out recommendations which informed and the Proposed Plan. The Strategic Environmental Assessment has been undertaken alongside the preparation of the Strategic Development Plan. Actions arising from the Strategic Environmental Assessment are also included within the Action Programme (pages 31-33) (CL/Doc37).

RESPONSES TO REPRESENTATIONS IN SUPPORT

TAYplan welcomes the support for these issues.

CONCLUSION

The Proposed Plan satisfies the requirements of the Planning etc. Scotland Act 2006 (CL/Doc17) and has been prepared in response to The Scottish Government's drive to see Strategic Development Plans which are clear, concise and visionary. TAYplan considers that all of the issues raised do not warrant any change to the Proposed Strategic Development Plan (June, 2011) and propose that the elements dealt with in this Schedule 4 Summary of Unresolved Issues remain as written and unchanged.

Reporter's conclusions:

[Note: For DPEA use only.]

Reporter's recommendations:

[Note: For DPEA use only.]

2. Copy of representations pertinent to this issue

3. Library of documents and extracts (less than 50 pages) referred to within representations and/or this Schedule